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*Attorneys for Plaintiff
United Therapeutics Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

UNITED THERAPEUTICS CORPORATION,

Plaintiff,

v.

SANDOZ INC., et al.,

Defendants.

Civil Action No. 13-316 (PGS)(LHG)
Civil Action No. 12-1617 (PGS) (LHG)

**NOTICE OF PLAINTIFF UNITED
THERAPEUTICS' MOTION IN
LIMINE TO EXCLUDE
DR. STUART RICH'S TESTIMONY ON
THE TOPICS OF INHERENT
ANTICIPATION AND ORGANIC
CHEMISTRY**

TO: Christina Lynn Saveriano, Esq.
Eric I. Abraham, Esq.

HILL WALLACK, LLP
202 Carnegie Center
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COUNSEL:

PLEASE TAKE NOTICE that on **May 1, 2014**, or as soon as counsel may be heard, the undersigned counsel for Plaintiff United Therapeutics Corp. ("Plaintiff"), in the above captioned matter shall move before the United States District Court for the District of New Jersey, for an Order granting its Motion in Limine seeking to preclude Dr. Stuart Rich, Defendant Sandoz Inc.'s expert on matters relating to one of the three patents at issue, U.S. Patent No. 5,153,222, from offering testimony and opinions related to (1) inherent anticipation and (2) organic chemistry.

PLEASE TAKE FURTHER NOTICE that in support of the motion, Plaintiff relies upon its Memorandum of Law (filed under seal) and the Declaration of Stephen M. Orlofsky in Support of United Therapeutics' Motions in Limine (and accompanying exhibits thereto, including those filed under seal).

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is being filed herewith.

The undersigned hereby requests oral argument if opposition is received.

Respectfully submitted,

BLANK ROME LLP

By: /s/ Stephen M. Orlofsky
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Dated: April 7, 2014

Attorneys for Plaintiff

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